

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Josue Pereira

Case No. Case: 2:23-mj-30188

Assigned To : Unassigned

Assign. Date : 5/9/2023

USA V. SEALED MATTER (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 2021 through January 2023 in the county of Oakland and elsewhere in the Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. §§ 2251(a) and (e)
 18 U.S.C. § 2422(b)
 18 U.S.C. § 2252A(a)(2)
 18 U.S.C. § 2252A(a)(5)(B)

Offense Description

Producing and attempting to produce child pornography
 Enticement of a minor to engage in illicit sexual activity
 Receipt and distribution of child pornography
 Possession of child pornography

This criminal complaint is based on these facts:

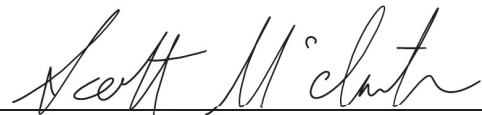
see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
 and/or by reliable electronic means.

Date: May 9, 2023

City and state: Detroit, Michigan



Complainant's signature

Scott C. McIntyre, Task Force Officer (FBI)

Printed name and title



Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Scott C. McIntyre, a Task Force Officer with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

INTRODUCTION

1. I am a Police Officer with the Birmingham Police Department and have been since January 2017. I am presently serving as a Task Force Officer (TFO) of the FBI, assigned to the Oakland County Resident Agency, and have been so assigned since January 2022.

2. As a Task Force Officer, I am authorized to investigate violations of laws of the United States and to execute arrest warrants issued under the authority of the United States.

3. This affidavit is made in support of an application for a criminal complaint and arrest warrant for JOSUE PEREIRA (DOB XX/XX/1984) for violations of 18 U.S.C. §§ 2251(a) and (e) (producing and attempting to produce child pornography), 18 U.S.C. § 2422(b) (enticement of a minor to engage in illicit sexual activity), and 18 U.S.C. §§ 2252A(a)(2) (receipt and distribution of child pornography) and 2252A(a)(5)(B) (possession of child pornography).

PROBABLE CAUSE

4. On or about January 31, 2023, the Birmingham Police Department (BIPD) received a facsimile from Child Protective Services advising of a possible

sexual relationship between a 14-year-old female, Minor Victim (MV), date of birth (DOB) XX/XX/2007, and a 38-year-old male, identified as Josue Pereira, DOB XX/XX/1984.

5. On or about January 31, 2023, a BIPD officer and a department clinician interviewed MV regarding the incident. MV initially met Pereira in approximately November 2021, when Pereira spent Thanksgiving at MV's residence in Birmingham, Michigan. Pereira resided in MV's grandmother's guest house in Alva, Florida, and MV's uncle and Pereira were friends. Subsequent to meeting in November 2021, MV and Pereira began exchanging sexually explicit material through digital communications when Pereira returned to Florida. MV and Pereira spoke through applications such as iMessage, Snapchat, Signal, WhatsApp, and Google Docs. MV deleted conversations with Pereira off her phone but was still able to access some of the Google Docs conversation. MV and her father provided BIPD officers access to the Google Docs conversation for their review. MV also provided the BIPD officer with Pereira's telephone number.

6. On or about February 16, 2023, MV was interviewed at Care House of Oakland County. During the forensic interview, MV made the following disclosures:

- Pereira knew MV was 14 years old. Pereira and MV knew "everything" about each other because they were like family.

- MV met with Pereira on family vacations to Florida. During trips to Florida in February and July of 2022, MV and Pereira kissed on multiple occasions, and on one occasion, Pereira placed his hand on her vulva, underneath her bathing suit (July 2022 trip).
- At various points spanning from November 2021 through January 2023, MV sent Pereira nude images over the Signal¹ application. Pereira told MV he saved nude images of her. Pereira told MV he printed one of the photographs and ejaculated on it. Pereira and MV sent each other sexual audio recordings through Google Docs².
- MV and Pereira masturbated together on video calls using FaceTime or WhatsApp. During video calls, Pereira had MV choke and slap herself, and insert objects into her vagina, such as a marker. Pereira was into “kid stuff,” and Pereira had MV dress as a toddler during video calls. MV wore a onesie, put her hair in pigtails, and put a pacifier-type object in her mouth. Toward the end of their interactions, Pereira wanted to engage in these sexual video calls almost nightly.
- Pereira intended to travel to Michigan at the end of February 2023 for the purpose of engaging in physical sexual acts with MV. MV and Pereira agreed to oral sex as MV was not comfortable with engaging in sexual intercourse.

7. MV provided BIPD officers access to the Google Docs conversations MV had with Pereira. A review of the Google Docs document revealed extensive conversations between MV and Pereira. The Google Docs document is titled “El Poder del Ahora” and the owner of the document is “In Human Terms.” MV

¹ Signal - a secure messenger application that offers end-to-end encryption. The website states, “We can't read your messages or listen to your calls, and no one else can either.”

² Google Docs - the website states, “Create and collaborate on online documents in real-time and from any device.” Google Docs also offers the ability to integrate audio notes into the collaboration document.

confirmed she was user “In Human Terms” and Pereira was “Lucas Wylde.” MV and Pereira used code words, for example, “math” referred to masturbation. Many of the conversations describe their plans for leaving the United States together, acknowledgment of MV’s age, and were often sexually explicit in nature. Both Pereira and MV sent several photographs of themselves in their Google Docs conversation. Many of the photographs sent included Pereira’s face, indicating he was the individual communicating with MV. *(Note: As Google Docs is used as a collaboration tool to form one document, it does not always visually document which user wrote each statement, and only provides the date and time of the last edit.)*

8. Below are conversation excerpts from the Google Docs document:

The below excerpt is from on or around October 6, 2022. The text depicted in green was written by Pereira’s username, “Lucas Wylde,” and the text depicted in purple was written by MV’s username, “In Human Terms.”

Yeah but me trying to put it in and taking it out and stuff made my pussy all sensitive so I'm definitely still thinking of you
Also I slept well, and I know I had a dream of you but I don't remember what happened

I was thinking that it might make you horny, which in turn made me horny. I just remember how tight your pussy gripped that thing. You look so absolutely beautiful, I am in love with your face and in love with you.

The below excerpt is from on or around December 7, 2022. The text depicted in black was written by Pereira’s username, “Lucas Wylde,” and the text depicted in green was written by MV’s username, “In Human Terms.”

OK so I was actually doing math a little bit ago and looking at your pictures and imagining your pussy which is interesting, what did you feel
I just felt stimulation like sexual and I felt like I was being used sexually
I love the way you said that, exactly the way you said it it's so fucking beautiful because I am the same way, I'd rather never have to ask you because you are healthy and the same thing with me love ❤️ yes I knew you'd get it
I'm so fucking I love with you

The below excerpt is from on or around December 15, 2022. The text depicted in green was written by Pereira's username, "Lucas Wylde," and the text depicted in purple was written by MV's username, "In Human Terms."

I can't wait to do math with you
I'm so sorry baby, daddy cannot wait to take such good care of his little girl, she needs to be pleased and treated well and taken care of
I can't wait ❤️ thank you for always knowing how to take care of me
I will take complete an absolute control of your body, your mind and your spirit, and make you so slutty in ways You have no idea about
(: yes I do and yea you do
Just simply control you
You belong to me and I decide what to do to my little girl
Daddy's little girl loves him so Fucking much too
Just know that daddy loves you so so fucking much

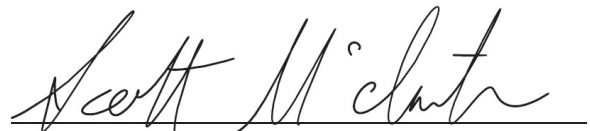
The below excerpt is from on or around January 10, 2023. The text depicted in green was written by Pereira's username, "Lucas Wylde," and the text depicted in purple was written by MV's username, "In Human Terms."

Why did you screenshot my snap story?
I am not trying to-just doesnt make sense
What
I am not changing subject, i would like to know whydid took a scshot of it
You took advantage of me
You made a kiss from a 14 year old into a sexual relationship
You knew i didnt need that
Sure i know
I did not hurt you

CONCLUSION

9. Based on the Google Docs conversations between Pereira and MV and a forensic interview conducted with MV, I believe that probable cause exists that JOSUE PEREIRA (DOB XX/XX/1984) has violated 18 U.S.C. §§ 2251(a) and (e) (producing and attempting to produce child pornography), 18 U.S.C. § 2422(b) (enticement of a minor to engage in illicit sexual activity), and 18 U.S.C. §§ 2252A(a)(2) (receipt and distribution of child pornography) and 2252A(a)(5)(B) (possession of child pornography).

Respectfully submitted,



Scott C. McIntyre, Task Force Officer
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Kimberly G. Altman
United States Magistrate Judge

Date: May 9, 2023